

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Tyjuan Frazier-Henderson

Case No. 2:24-mj-30329

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 6, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in Possession of a Firearm

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 8, 2024

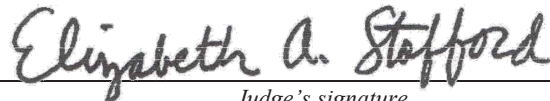
City and state: Detroit, MI



Complainant's signature

Danielle Stefanovski, Special Agent, ATF

Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Special Agent Danielle Stefanovski, being first duly sworn, hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under federal law.

2. I have been an ATF Special Agent since March of 2018, and I have had extensive law enforcement training, including the Criminal Investigator Training Program at the Federal Law Enforcement Training Center, the United States Secret Service (USSS) Special Agent Training Program in Beltsville, Maryland, and ATF Special Agent Basic Training in Glynco, Georgia. I also received a Bachelor of Business Administration from the University of Michigan.

3. As an ATF Special Agent, I have participated in numerous criminal investigations, including investigations involving firearms, firearm traffickers, armed drug tracking, and criminal street gangs. I am familiar with, and have experience using, a variety of investigative techniques and resources, including

physical and electronic surveillance, undercover investigation work, and various types of informants and cooperating sources.

4. The statements contained in this affidavit are based, in part, on my review of written police reports by Detroit Police Department (DPD) officers. This affidavit also includes information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter, my own investigation, and the review of documents.

5. ATF is currently conducting a criminal investigation involving Tyjuan Terrell FRAZIER-HENDERSON (B/M; DOB: XX/XX/1999) for violation of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

PROBABLE CAUSE

6. On August 6, 2024, at approximately 11:00 p.m., Detroit Police officers were patrolling the area of Plymouth Road and Prest Street in Detroit, Michigan, when the officers observed two males walking in the street, where sidewalk was provided. One of the officers observed an individual, later identified as Tyjuan Terrell FRAZIER-HENDERSON, with his left hand in his front hoodie pocket. As officers got closer to FRAZIER-HENDERSON, they spoke to FRAZIER-HENDERSON, but FRAZIER-HENDERSON walked past the police vehicle.

7. One of the officers used his flashlight and observed an object appearing to be in the shape of a firearm pressed against the inside of FRAZIER-HENDERSON's front hoodie pocket. An officer exited his scout car to speak with FRAZIER-HENDERSON, but FRAZIER-HENDERSON fled on foot away from officers. FRAZIER-HENDERSON ran into the backyard of a residence on Prest, with his left hand still in the front hoodie pocket. As he was running away, FRAZIER-HENDERSON threw a black object into the brush. FRAZIER-HENDERSON then attempted to jump the fence into the neighboring yard but was unsuccessful.

8. Officers then attempted to apprehend FRAZIER-HENDERSON and gave him multiple commands to place his hands behind his back, however FRAZIER-HENDERSON was resistant. After a short struggle, officers were able to detain FRAZIER-HENDERSON. At this time, the officers did not observe the object that appeared to be a firearm in FRAZIER-HENDERSON's front hoodie pocket.

9. One of the officers returned to the brush where he previously observed FRAZIER-HENDERSON throw the black object and recovered a black Glock, model 43X, 9mm pistol, bearing serial number BLYG928, loaded with one round in the chamber and an extended magazine, which was loaded with an undetermined amount of ammunition.

10. I have reviewed FRAZIER-HENDERSON's criminal history.

According to the criminal history report, FRAZIER-HENDERSON pled no contest to assault with the intent to rob and plead guilty to home invasion first degree in 2016 in the 22nd Circuit Court in Washtenaw County. According to the publicly available register of actions in that case, after his plea in circuit court, FRAZIER-HENDERSON was ordered committed as a juvenile to the Family Independence Agency, so I am uncertain about the effect of this plea. Notwithstanding this, according to his criminal history, FRAZIER-HENDERSON was convicted of carrying a concealed weapon in the Wayne County Circuit Court in 2021. Additionally, FRAZIER-HENDERSON's criminal history report shows that he was charged in Wayne County, Michigan, in March 2024 with being a felon in possession of a firearm. I have reviewed the register of actions from Wayne County and learned that about six weeks ago, on June 21, 2024, FRAZIER-HENDERSON pled guilty to being a felon in possession of a firearm and is on bond pending sentence for that offense. In the State of Michigan, felon in possession and carrying a concealed weapon are both crimes punishable by more than a year in prison. Given that he admitted to being a felon in his state court plea, I believe that FRAZIER-HENDERSON knew he was a felon when possessed the Glock in this case.

11. I have spoken with ATF SA Matthew Totten, who is an expert in the interstate nexus of firearms. SA Totten informed me that the Glock, model 43X, 9mm pistol was manufactured outside the State of Michigan and, therefore, FRAZIER-HENDERSON's possession of it was in and affecting commerce.

CONCLUSION

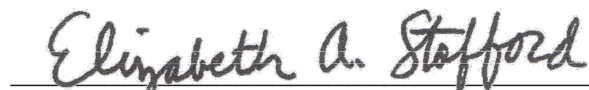
12. Based upon the aforementioned facts stated herein, there is probable cause to believe that Tyjuan FRAZIER-HENDERSON (B/M; DOB: XX/XX/1999), a previously-convicted felon, did knowingly and intentionally possess a Glock 43X, 9mm handgun bearing serial number BLYG928, said firearm having affected interstate commerce, in violation of 18 U.S.C. 922(g)(1) (Felon in Possession of a Firearm). Said violation occurring on or about August 6, 2024, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Danielle Stefanovski
Special Agent, ATF

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Dated: August 8, 2024